

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JESSE FREGOSO

Plaintiff,

v.

WELLS FARGO DEALER SERVICES, INC.,
CASHCALL, INC., PROFESSIONAL
COLLECTIONS CONSULTANTS, INC.,
SANTANDER CONSUMER USA, INC., and
WILSHIRE CREDIT CORP

Defendants

Civil Action No. 2:11-cv-05153-MAM

DEFENDANT WELLS FARGO DEALER SERVICES, INC.'S MOTION TO DISMISS

Defendant Wells Fargo Dealer Services (“Wells Fargo”), hereby moves to dismiss the Complaint filed by Plaintiff Jesse Fregoso for failure to state a claim upon which relief can be granted pursuant to Fed. R. Civ. P. 12(b)(6), all as set forth in Wells Fargo's Memorandum of Law, which is incorporated herein by reference.

Respectfully submitted,

s/Mark Pfeiffer

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